

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

KNIFE RIGHTS INC., *et al.*,

Plaintiffs,

v.

MERRICK GARLAND, *et al.*,

Defendants.

Civil Action No. 4:23-cv-547-O

**JOINT MOTION TO ENTER PROPOSED BRIEFING SCHEDULE**

The parties respectfully request that the Court enter a stipulated schedule for briefing Defendants' forthcoming motion to dismiss. A proposed order will be submitted separately.

Plaintiffs commenced this action on June 1, 2023, *see* ECF No. 1, challenging as unconstitutional 15 U.S.C. §§ 1242-43, which concern switchblade knives. On June 9, 2023, Plaintiffs completed service of process on the United States Department of Justice. *See* ECF No. 10.

Defendants intend to move to dismiss Plaintiffs' Complaint, but Defendants require a short amount of additional time to prepare their motion. The statutes at issue in the Complaint are not frequent subjects of litigation, and so Defendants require additional time to prepare and present their arguments to this Court. Apart from Defendants' response to the Complaint, there are no other pending deadlines. Accordingly, the parties have conferred and have agreed to request that the Court adopt the following deadlines for briefing Defendants' prospective motion:

- On or before September 22, 2023, Defendants will file their motion to dismiss;
- On or before October 13, 2023, Plaintiffs will file their response;
- On or before November 3, 2023, Defendants will file their reply.

The parties also respectfully request that Defendants' deadline to respond to the Complaint be extended to September 22, 2023.

The parties appreciate the Court's consideration.

Dated: July 24, 2023

Respectfully submitted,

Respectfully submitted,

DILLON LAW GROUP APC

By: /s/ John Dillon  
JOHN W. DILLON

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/s/ Michael Drezner  
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**CERTIFICATE OF CONFERENCE**

The parties conferred and have agreed about the relief requested herein.

/s/ Michael Drezner  
MICHAEL DREZNER  
Trial Attorney  
U.S. Department of Justice

**CERTIFICATE OF SERVICE**

I hereby certify that on July 24, 2023, I electronically filed the foregoing document with the Clerk of Court using this Court's CM/ECF system, which will notify all counsel of record of this filing.

/s/ Michael Drezner  
MICHAEL DREZNER  
Trial Attorney  
U.S. Department of Justice